

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:)
FRONTIER COMMUNICATIONS)
CORPORATION, *et al.*¹) Chapter 11
) Case No. 20-22476-mg
) (Jointly Administered)
)
)

**JOINT STIPULATION AND ORDER BETWEEN MOVIE COMPANY CLAIMANTS I
AM WRATH PRODUCTIONS, INC.; HANNIBAL CLASSICS INC.; JUSTICE
EVERYWHERE PRODUCTIONS LLC; BADHOUSE STUDIOS, LLC AND DEBTOR**

1. WHEREAS, on April 14, 2020, Frontier and certain of its direct and indirect subsidiaries and affiliates (collectively, “Debtors”) voluntarily filed petitions under Chapter 11 of the United States Bankruptcy Code in the Southern District of New York, jointly administered under Case No. 20-22476 (the “Bankruptcy Case”);
2. WHEREAS, on August 21, 2020 Debtors filed their *Fifth Amended Joint Plan of Reorganization of Frontier Communications Corporation and its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code* [ECF No. 984] (the “Plan”) in the Bankruptcy Case;
3. WHEREAS, on August 27, 2020, the Bankruptcy Court entered an Order in the Bankruptcy Case confirming the Plan;
4. WHEREAS, on June 8, 2020, I Am Wrath Productions, Inc. filed a proof of claim in the Bankruptcy Case asserting a general unsecured claim in the amount of \$175,000.00 based on theories of secondary copyright infringement with respect to one movie – *I Am Wrath* (the “Wrath Work”) [Claim No. 1378] (the “Wrath Claim”);

¹ Due to the large number of debtor entities in these chapter 11 cases, for which joint administration has been granted, a complete list of the debtor entities and the last four digits of their federal tax identification numbers are not provided herein. A complete list of such information may be obtained on the website of the Reorganized Debtors’ claims and noticing agent at <https://cases.primeclerk.com/ftr>. The location of the Reorganized Debtors’ service address for purposes of these chapter 11 cases is: 50 Main Street, Suite 1000, White Plains, New York 10606.

5. WHEREAS, on June 8, 2020, Hannibal Classics Inc. filed a proof of claim in the Bankruptcy Case asserting a general unsecured claim in the amount of \$325,000.00 based on theories of secondary copyright infringement with respect to two movies – *USS Indianapolis: Men of Courage* and *Tokarev* (the “Hannibal Classic Works”) [Claim No. 1372] (the “Hannibal Classic Claim”);

6. WHEREAS, on June 8, 2020, Justice Everywhere Productions LLC filed a proof of claim in the Bankruptcy Case asserting a general unsecured claim in the amount of \$175,000 based on theories of secondary copyright infringement with respect to one movie – *Vengeance: A Love Story* (the “Vengeance Work”) [Claim No. 1394] (the “Vengeance Claim”);

7. WHEREAS, on June 8, 2020, Badhouse Studios, LLC filed a proof of claim in the Bankruptcy Case asserting a general unsecured claim in the amount of \$325,000 based on theories of secondary copyright infringement with respect to two movies – *Larceny* and *Rumble* (the “Badhouse Works”) [Claim No. 1434] (the “Badhouse Claim”);

8. WHEREAS, on April 30, 2021, the Effective Date of the Plan occurred, and the Plan was consummated; and

9. WHEREAS, pursuant to Fed. R. Bankr. P. 7041 and Fed. R. Civ. P. 41(a)(1)(A)(ii) and/or 41(a)(2), I Am Wrath Productions, Inc.; Hannibal Classics Inc.; Justice Everywhere Productions LLC; Badhouse Studios, LLC and Debtors (collectively, “Parties”) stipulate to the dismissal of the Wrath Claim, Hannibal Classic Claim, Vengeance Claim and Badhouse Claim and all known and unknown claims between the Parties with prejudice, with each Party to bear its own costs and attorneys’ fees. In the interest of clarity, the parties further stipulate that no Party will seek recovery of costs or attorneys’ fees against the other incurred in this contested proceeding.

DATED: New York, New York
May 2, 2025

/s/ Kerry S. Culpepper
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Attorney for Frontier Communications Corporation

SO ORDERED:

Dated: New York, New York
May __, 2025

Chief Judge Martin Glenn
United States Bankruptcy Judge